

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

PREMIER CAPITAL, LLC,	)	
	)	
Plaintiff,	)	
	)	Civil Action No.
v.	)	03-CV-12497-NG
	)	
BEVERLY JOHNSON PENZELL, d/b/a	)	
Law Office of Kris E. Penzell,	)	
et al.,	)	
	)	
Defendants.	)	

AFFIDAVIT OF RICHARD GLEICHER IN SUPPORT OF  
PLAINTIFF/DEFENDANT-IN-COUNTERCLAIM  
PREMIER CAPITAL, LLC'S OPPOSITION TO  
DEFENDANT BEVERLY JOHNSON PENZELL'S  
MOTION FOR SUMMARY JUDGMENT

MIDDLESEX, ss:

I, RICHARD GLEICHER, being duly sworn, do hereby depose  
and state that:

1. I am duly-authorized agent of the plaintiff,  
Premier Capital, LLC ("Premier"), and have personal  
knowledge with respect to the matters set forth in this  
affidavit. I make this affidavit on my personal knowledge  
and in support of Premier's Opposition to the Motion For  
Summary Judgment of defendant Beverly Johnson Penzell  
("Penzell").

2. Premier is a limited liability corporation  
organized under the laws of Delaware, with a principal place  
of business at 226 Lowell Street, Wilmington, Middlesex  
County, Massachusetts 01887.

3. Penzell is a defendant individually and as Personal Representative of the Estate of her late husband, the Florida attorney Kris E. Penzell. Penzell is also principal of Penzell & Associates, Inc., which is, upon information and belief, a Florida corporation engaged in the purchase and collection of distressed financial assets.

4. Premier is in the business of buying, selling, and liquidating distressed financial assets, including court judgments related to such assets.

5. On September 19, 2001, Bank of America, N.A. ("BofA") and Premier entered into a Loan Sale Agreement in which, among other things, BofA conveyed to Premier all of its right, title and interest in 19 Florida court judgments in which the Penzell Law Firm represented BofA and/or its predecessors, and all file documents and other property related thereto (the "Florida litigation matters").

6. As part of the BofA-Premier sale, Premier purchased certain judgments arising out of collection actions in the State of Florida, agreeing to be bound by certain contingent fee agreements.

7. In late 2001 and early 2002, Premier reviewed the assets conveyed in the BofA-Premier sale to determine their status and formulate a collection strategy. During this review, Premier learned that Kris E. Penzell was counsel of record in the Florida litigation matters.

8. Premier contacted Mr. Penzell's firm (the "Penzell Law Firm") and was put in touch with Penzell. She advised Premier that Mr. Penzell had passed away, but that the Penzell Law Firm continued as a going concern, engaged in collection activity.

9. Penzell further advised Premier that a contingency fee agreement was in place which required Premier to pay the Penzell Law Firm 30 per cent of all collection moneys going forward. Premier's files from BofA lacked such an agreement.

10. On January 11, 2002, Premier asked Penzell for a copy of such agreement. She faxed to Premier a written document dated December 23, 1998, between the Law Office of Kris E. Penzell ("Penzell Law Firm") and NationsBank, N.A., purporting to be a contingency fee agreement respecting the Florida litigation matters (the "1998 Agreement"). This Agreement involved a number of collection matters initially brought by Kris E. Penzell on behalf of Barnett Bank and NationsBank, N.A..

11. One Florida litigation matter of some urgency in January, 2001, involved judgment debtors Efraim and Robin Arroyave. This was an old Barnett Bank matter. The debtors had filed for bankruptcy protection. While the 1998 Agreement required the Penzell Law Firm to enter its appearance in judgment-related bankruptcies, Premier

determined it had not done so, and retained its own counsel, whom it retained on an hourly basis. Premier was paid an amount to release its lien. an amount equal to the legal fees of Premier's counsel to release its lien (the bankruptcy remains pending).

12. Also in late 2001 and early 2002, Penzell verbally told Premier that the Penzell Law Firm asserted a lien on the Florida litigation matters' files, pending payment of the 30 per cent share referred to above.

13. Premier reviewed the 1998 Agreement and concluded that it did not bind Premier because, among other reasons, it involved NationsBank, N.A., and contained a termination provision which obliged the Penzell Law Firm to settle its accounts with NationsBank, N.A.

14. At no time prior to the commencement of this action did Penzell bill Premier for moneys allegedly owed her late husband, under the 1998 Agreement or otherwise.

15. During 2002 and early 2003, Premier engaged in repeated communications with Penzell, attempting to obtain information about the status of the Florida litigation matters, and, in April, 2003, sending Penzell, at her request, a new, draft contingent fee agreement that would bind the parties and cover new matters.

16. Penzell never responded with comments about the draft agreement. She was highly unresponsive to Premier's

repeated requests for information about the matters during this period.

17. Premier was never advised by anyone, prior to the filing of the above-captioned action, that two Inventory Attorneys, Victor K. Rones and Susan I. Noe, had been appointed to wind up the Penzell Law Firm's affairs. Indeed, at all times prior to the filing of this action, Penzell held the Penzell Law Firm out as a going concern, employing, among other things, Penzell Law Firm letterhead in her letters and faxes to Premier.

18. Premier finally demanded return of the files in the Florida litigation matters. Such return was essential, for as long as Penzell asserted a lien and refused to cooperate in returning the files, Premier was unable to obtain new counsel.

19. Premier currently owns tens of thousands of distressed assets, including judgments, many of which are in pre- or post-judgment litigation and collection. Premier is represented by hundreds of attorneys throughout the country, usually on a contingent-fee basis. Penzell's conduct put Premier in the untenable position of being potentially liable to successor counsel for its contingent fee, while also remaining allegedly liable to Penzell for her claimed 30 per cent share. As a business matter, Penzell's retention of the files and claim of lien froze collection

activity in place. Penzell never communicated what she was owed, nor whether she would release her alleged lien, but rather always insisted that she was doing collection work on the matters and would continue to do so.

20. Neither Premier, nor potential counsel in Florida whom Premier contacted, could proceed with further collection until Premier's dispute with Penzell was resolved through return of the files.

21. With Penzell refusing to return the files, Premier brought this action.

22. On or about March 7, 2005, Premier through its counsel received Penzell's first purported, written documentation of amounts she claims Premier owes her husband. A true copy of this document is attached as Exhibit A.

23. On or about February 21, 2006, Premier through its counsel received the first detailed accounting, inclusive of Kris E. Penzell's purported time charges, of the amount Penzell alleges Premier owes the Penzell Law Firm. A true copy of this document is attached as Exhibit B.

24. In December, 2004, Premier succeeded in persuading a Florida judge to order return of the Florida litigation matters files to Premier. Such files contained approximately 12 copies of the 1998 Agreement. In addition, the files held numerous documents to which Premier had not

had access, such as letters to BofA in several matters from Mr. Ronen in which he advised BofA that he was suspending further collection activity.

25. At depositions in Miami, Florida, on September 24-25, 2007, Premier learned for the first time that the 1998 Agreement had been superceded by a "Settlement Agreement and General Release" dated December 6, 1999, between BofA and "Kris Penzell, P.A. and Kris Penzell, individually" ("1999 Agreement"). Premier did not possess the 1999 Agreement, and had at no time been given the 1999 Agreement by Penzell. The 1999 Agreement covered the very Barnett Bank judgments which BofA had sold to Premier in 2001, and included a Penzell Law Firm release of BofA for any liability for past and future Penzell legal fees and expenses.


26. In her motion, Penzell cites the amount Premier paid for the loan pool in which the Florida litigation matters were included, suggesting this can serve as a measure of Premier's damages. Such amount was for the pool as a whole (and for another BofA pool, bought the same day); it does not represent a matter-by-matter accounting of the value of each matter. Premier bid on ten other such pools that day, and in fact purchased a second pool of assets.

27. Premier is a for-profit entity, and the amount of its bid is minor compared to the price of the assets Premier purchases. Premier must take into account its

administrative, investigative and overhead costs, legal fees and expenses. In collection activity, Premier's costs reflect the time value of money and the reality that some assets will pay in full, and others will never generate a recovery despite a large investment in time and money. Respecting judgments, some will pay in full; others will be discharged in bankruptcy.

28. After 6-8 years, Premier hopes to realize a total return on its investment of 15-20 per cent. Premier's costs are 5-6 times its investment in pools such as the one involved in this action.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY this 14<sup>th</sup> day of November, 2007.

  
Richard Gleicher, as  
Duly-Authorized Agent,  
Premier Capital, LLC



**STEVEN A. SUSSMAN**

ATTORNEY AT LAW

6 BEACON STREET, SUITE 400

BOSTON, MA 02108

TEL: (617) 973-4800 FAX: (617) 248-0499

EMAIL: S.SUSSMAN@VERIZON.NET

March 7, 2005

Thomas James Morrissey, Esq.  
Hoisington and Morrissey, P.A.  
1506 Drift Road  
Westport, MA 02790

Re: Premier Capital, LLC v. Beverly Johnson Penzell, as personal  
representative of the Estate of Kris E. Penzell, et al.  
C. A. No. 03-CV-12497-NG

Dear Mr. Morrissey:

This follows the request for a breakdown of the damages sought by the counterclaim filed in the above-referenced case.

Attached hereto (Exhibit A) is a list of nineteen judgments obtained by Attorney Kris E. Penzell on behalf of the Bank of America, or its predecessors, on files subsequently purchased by Premier Capital from the bank. The total amount of legal fees owed to the Law Offices of Kris E. Penzell, P.A. on these nineteen files is \$63,932.10. The estate has incurred additional consequential damages in excess of \$10,000.00. This amount will escalate as the litigation continues.

The foregoing does not include the estate's claim for multiple damages or claims for damages resulting from any additional judgments obtained for the bank by the Law Offices of Kris E. Penzell, P.A. upon which Premier has collected funds.

If your client has a serious interest in negotiating a resolution of these claims, this is the appropriate time to do so. Please advise.

Sincerely,



Steven A. Sussman

cc: Beverly Penzell  
Catherine J. Savoie, Esq.

**EXHIBIT A**

<u>Debtor</u>	<u>Hours</u>	<u>Amount</u>
Hiram Martinez	38.10	\$4,191.10
Bradley Boat Repairs	25.45	\$2,799.50
Lanier & Sons Steam Clean Carper System	31.30	\$3,443.00
Redlands Air Conditioning & Refrigeration	24.05	\$2,645.50
Design Home Remodeling	35.30	\$3,883.00
Golden Razor Barber Shop	33.60	\$3,696.00
Thomas Kenworthy	27.30	\$3,003.00
Metropolitan Industries	27.10	\$2,981.00
Ricardo Rios	21.25	\$2,365.00
Richard Ramos	26.35	\$2,898.50
M&R Latin American	62.30	\$6,853.00
The Supernet Online	24.65	\$2,711.50
Antonio Lioy	29.50	\$3,245.00
Jeni L. Jayson	44.35	\$4,878.50
Multicare Medical Supplies	27.25	\$2,997.50
Top Ten Card Co	7.25	\$797.50
The Wisteria Branch	24.45	\$2,799.50
Velmas Golden Needle	24.25	\$2,667.50
Chaka Kiambu	46.15	<u>\$5,076.50</u>
<b>TOTAL</b>		<b>\$63,932.10</b>

**STEVEN A. SUSSMAN**

ATTORNEY AT LAW

6 BEACON STREET, SUITE 400

BOSTON, MA 02108

TEL: (617) 973-4800 FAX: (617) 248-0499

EMAIL: S.SUSSMAN@VERIZON.NET

February 21, 2006

Thomas James Morrissey, Esq.  
PO Box 1336  
Brookline, MA 02446

Re: Premier Capital, LLC v. Beverly Johnson Penzell, as personal  
representative of the Estate of Kris E. Penzell, et al.  
C. A. No. 03-CV-12497-NG

Dear Mr. Morrissey:

Attached hereto (Exhibit A) is a list of nineteen judgments obtained by Attorney Kris E. Penzell on behalf of the Bank of America, or its predecessors, on files subsequently purchased by Premier Capital from the bank. The total amount of legal fees owed to the Law Offices of Kris E. Penzell, P.A. on these nineteen files is \$63,932.10. There is an itemization of the fee for each file.

If you have any questions, please let me know.

Sincerely,



Steven A. Sussman

cc: Beverly Penzell  
Joseph W. Corrigan, Esq.

**EXHIBIT A**

<u>Debtor</u>	<u>Hours</u>	<u>Amount</u>
Hiram Martinez	38.10	\$4,191.10
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<b>TOTAL</b>		<b>\$63,932.10</b>

Re: Barnett Bank of South Florida, N.A. v. Hiram Martinez

## For Professional Services Rendered:

06/25/86	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Conference with Bank officer	3.00
06/27/86	Prepare Complaint Letter to Bank	2.00
07/12/86	Review correspondence from Bank; Review executed Complaint	.50
07/13/86	Review file; Prepare Summonses; Conference with process server; Forward to Court	.75
09/15/86	Review returns of service	.25
10/01/86	Conference with Bank officer; Conference with process server re: address for Defendants	.50
10/03/86	Conference with Bank officer	.25
10/09/86	Prepare Nonmilitary Affidavit; Letter to Bank	.75
10/15/86	Review correspondence from Bank; Review executed Affidavit	.25
10/22/86	Prepare Motion/Order of Default; Forward to Court	.50
10/23/86	Review Motion to Dismiss and Affidavit	.75
10/24/86	Prepare Notice of Hearing (Motion Calender)	.25
11/03/86	Review Notice of Default Not Entered;	.15
11/03/86	Prepare Re-Notice of Hearing	.35
11/18/86	Letter to defendant's attorney cancelling hearing	.25
11/24/86	Review letter from defendants attorney; enclosed Motion for . Agreed Order on Defendant's Motion to Quash Service of Process; Letter to defendants attorney; Forward to Court	1.00
11/25/86	Complaint forwarded to defendant's attorney via certified mail	.50
11/26/86	Prepare Stipulation for Settlement; Letter to defendant' attorney	1.00
12/08/86	Letter from defendant's attorney with Stipulation for Settlement; Review Certified Mail receipt	.35
12/09/86	Letter to Bank; Stipulation for Settlement signed.	.35
01/06/87	Prepare Motion for Final Judgment; Affidavit in Support of Attorneys Fees and Costs; Final Judgment; Forward to Court	2.25
01/14/87	Review executed Final Judgment	.10
01/16/87	Prepare Motion to clarify and/or Amend Final Judgment	.50
01/26/87	Prepare Notice of Hearing (Motion Calender)	.35
02/12/87	Attendance at hearing on Motion to Amend	1.00
02/17/87	Prepare Amended Final Judgment; Forward to Court	.50
02/24/87	Review Amended Final Judgment	.10
02/26/87	Letter to Clerk certifying and recording Final Judgment; Prepare Execution; Letter to Clerk forwarding Execution to Sheriff	1.00

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02/26/87	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
03/18/87	Prepare Re-Notice of Taking Deposition; Letter to Attorney Marquez	.50
03/24/87	Conferences with process server	.25
03/30/87	Review returns of service from process server	.10
06/29/87	Review correspondence	.35
06/30/87	Prepare Motion for Writ of Garnishment and Writ of Garnishment After Judgment; Conference with process server; Forward to Court	1.50
07/01/87	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
07/08/87	Review return of no service of Subpoena for deposition	.10
07/14/87	Review Answer to Writ of Garnishment; Affidavit; Letter from Attorney Johnson	.75
07/14/87	Letter to bank with copy of correspondence from Frank T. Johnson, Defendant's Answer to Writ and Affidavit of Defendant	.50
07/27/87	Prepare Re-Notice of Taking Deposition	.35
07/31/87	Motion for Default as to Garnishee; Hand deliver to clerk	1.00
08/03/87	Prepare Motion for Final Judgment of Garnishment; Final Judgment of Garnishment; Forward to Court	1.00
08/10/87	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
08/13/87	Review return of no service; Correspondence from attorney for Garnishee	.25
08/18/87	Review executed Final Judgment of Garnishment	.10
08/19/87	Letter to Bank including Final Judgment of Garnishment and Answer to Writ of Garnishment	.25
08/24/87	Review Affidavit in Support of Motion to Set Aside Final Judgment of Garnishment; Motion to set Aside Default and Final Judgment of Garnishment	.50
08/24/87	Review Motion to Stay Execution; Order Vacating Default Previously Entered by the Clerk, Order Vacating Final Judgment Entered August 14 and Order Directing Clerk to Stay Execution;	.35
08/25/87	Review letter from Peter B. Cagle; copy of Motion and Order Setting Aside the Default Judgment and staying any possible Execution	.75

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09/15/87	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
09/16/87	Conferences with process server; Review returns of service from process server	.50
10/20/87	Preparation for and attendance at deposition of Defendant	2.25
10/22/87	Letter to bank	.50
12/07/00	Status Report to Bank	.50
04/09/01	Review file	<u>.25</u>

Total Hours 38.10

38.10 @ \$110.00 = \$4,191.00

Re: Barnett Bank of South Florida, N.A. vs Bradley Boat Repairs, Andrew & Therese Bradley

For Professional Services Rendered:

09/16/98	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Conference with Bank officer	3.00
09/23/98	Prepare Complaint Letter to Bank	2.00
10/05/98	Review executed Complaint	.10
10/05/98	Review file; Prepare Summonses; Conference with process server; Forward to Court	.75
10/08/98	Conference with Bank officer; Conference with process server re: address for Defendants	.50
10/12/98	Review returns of service	.25
10/13/98	Conference with Bank officer	.25
10/20/98	Prepare Nonmilitary Affidavit; Letter to Bank	.75
10/26/98	Review correspondence from Bank; Review executed Affidavit	.25
11/13/98	Review defendant's Answer; Prepare Plaintiff's Affidavit; Letter to Bank	1.00
12/04/98	Prepare Affidavit in Support of Attorney's Fees; Affidavit of Costs; Motion for Final Judgment; Proposed Final Judgment; Notice of Hearing; Forward to Court	3.50
01/04/99	Preparation for and attendance Motion for Summary Judgment as to Therese Bradley	2.00
01/14/99	Prepare Alias Summons as to Andrew Bradley	.25
02/02/99	Review return of service	.10
02/09/99	Conference with attorney and review Fax from Michael Frank, Esquire	.50
02/09/99	Fax to Michael Frank, Esquire	.25
02/10/99	Letter to Bank; Review Amended Suggestion of Bankruptcy and Second Amended Suggestion of Bankruptcy; Prepare Notice of Voluntary Dismissal as to Andrew Bradley only	1.00
02/24/99	Prepare Bankruptcy Proof of Claim	.75
02/25/99	Letter to Clerk certifying and recording Final Judgment; Prepare Execution; Letter to Clerk forwarding Execution to Sheriff	1.00
03/02/99	Review Bankruptcy Proof of Claim	.10
03/05/99	Review Execution	.10
03/05/99	Review return of service from Sheriff's office re: docketing of execution	.10
08/23/99	Review Order Dismissing Bankruptcy Case	.10



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09/01/99	Review Fax From Bank	.10
09/02/99	Prepare new Complaint adverse Andrew Bradley; Letter to Bank	2.00
10/08/99	Prepare Summons; Forward to Court	.35
10/10/99	Review return of no service from process server	.10
09/15/99	Prepare Alias Summons; Forward to Court	.35
12/27/99	Review return of no service from process server	.10
09/21/00	Review family court file	2.25
12/21/00	Research counsel in Belize	.50
01/17/01	Conference with attorney in Belize	.50
01/23/01	Conference with attorney in Belize	.25
04/25/01	Conference with Bank; Correspondences to Bank	<u>.35</u>

Total Hours 25.45

25.45 @ \$110.00 = \$2,799.50

Re: Barnett Bank of South Florida, N.A. vs Lanier & Sons Steam Clean Carpet System, Gipson, Lanier and Sylvia

For Professional Services Rendered:

06/19/91	Review correspondence from Bank: Review bank transmittal;	
	Review Bank documents; Conference with Bank officer	3.00
06/24/91	Demand letter to Lanier and Sons Steam Clean Carper	
07/02/91	Prepare Complaint	.50
	Letter to Bank	
07/08/91	Review correspondence from bank; Review executed complaint	2.00
07/11/91	Conference with defendant; Conference with Bank;	.50
	Prepare Stipulation for Settlement; Letter to Bank	
07/22/91	Letter to Gipson; Original Stipulation to be executed;	1.50
07/24/91	Letter to bank with payment from defendat	.25
08/13/91	Letter to Bank with copy of stipulation	.25
09/10/91	Letter to bank with payment from defendant	.25
09/23/91	Letter to bank with payment from defendant	.25
10/28/91	Letter to bank with payment from defendant	.25
12/09/91	Letter to bank with payment from defendant	.25
01/30/92	Letter to bank with payment from defendant	.25
02/20/92	Letter to bank with payment from defendant	.25
03/25/92	Letter to bank with payment from defendant	.25
04/30/92	Letter to bank with payment from defendant	.25
10/14/92	Letter to bank with payment from defendant	.25
12/16/92	Letter to bank with payment from defendant	.25
01/25/94	Conferences with defendant; Conference with attorney Cohen	.50
01/27/94	Review letter from Michael Seth Cohen, Esquire	.25
04/14/94	Prepare Irrevocable Assignment; Fax to Michael Cohen;	1.50
05/05/94	Fax to Michael Cohen, Esquire	.25
06/09/94	Letter to Lanier Gipson; Irrevocable Assignment and Waiver of Conflict of Interest;	.50
07/18/94	Review law regarding premises liability	1.00
07/19/94	Fax to Michael Cohen, Esquire	.25
09/06/94	Review Letter from Bank	.25
09/13/94	fax to attorney Alexander	.25
09/19/94	fax to Bank officer	.25
09/22/94	Review Letter from Bank	.25
09/29/94	Prepare Complaint; Letter to bank; Conference with Bank	2.00
04/08/96	Review Letter from Michael Seth Cohen, Esquire, written to Gipson	.25
02/27/97	Review file; Prepare Summonses; Conference with process server; Forward to Court	.75

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04/14/97	Conference with Bank officer; Conference with process server re: address for Defendants	.50
05/13/97	Review returns of service; Conference with Bank officer	.35
05/13/97	Preparation for and attendance at Pretrial Conference as to Lanier Gipson	1.50
05/21/97	Prepare Final Judgment; Affidavit of Attorneys fees; forward to Court	.75
06/03/97	Review executed Final Judgment	.10
06/03/97	Review Defendants Motion to set aside final judgment	.50
06/19/97	Preparation for and attendance at Defendants Motion to set aside Final judgment	1.50
06/25/97	Prepare Amended Final Judgment; Alias Summons and Notice to Appear for Pretrial as to Sylvia Gipson	.75
07/25/97	Letter to clerk; certification and recording of Final Judgment;	.25
08/06/97	Prepare Final Judgment as to Lanier Gipson and Affidavit of Attorney Fees; Forward to Court	.75
08/20/97	Letter to Clerk for Certification and Recording of Final Judgment	.25
08/20/97	Prepare Execution; Letter to Clerk;	.75
08/20/97	Letter to Bank with payment from defendant	.25
09/03/97	Review return of service from Sheriff's office re: docketing of Execution	.10
10/14/97	Letter to bank with payment from defendant	.25
06/26/97	Conference with Bank officer; Conference with process server re: address for Defendants	.50
07/23/97	Review returns of service	.25
12/19/97	Conference with Bank officer	.25
12/14/97	Letter to Bank with payment from defendant	.25
03/13/98	Conference with Mrs. Gipson; Letter to Mrs. Gipson; with estoppel information	.50
04/27/98	Review Notice and Judgment of Dismissal	.25
05/12/98	Letter to Judge Bloom; reL Notice and Judgment of Dismissal;	.25
05/06/98	Letter to bank with payment from defendant	.25
07/08/98	Prepare Execution; Letter to Clerk	.50
11/27/00	Status Report to Bank	.50
04/23/01	Prepare fax to Bank with copy of recorded judgment	.25

Total Hours 31.30

31.30 @ \$110.00 = \$3,443.00

Re: Barnett Bank of South Florida, N.A. vs Redlands Air Conditioning and Refrigeration

## For Professional Services Rendered:

11/03/95	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Review litigation file; Conference with Bank officer	3.00
11/06/95	Review correspondence from Bank including Bank documents	1.00
11/16/95	Prepare Affidavit in Support of Proceeding Supplementary; Motion for Proceedings Supplementary in Aid of Execution; Letter to Bank	1.50
11/27/95	Review correspondence from Bank; Prepare letter to clerk requesting re-assignment to judge in civil division	.50
07/19/96	Prepare Notice of Hearing	.35
08/14/96	Prepare Re-Notice of Hearing	.35
09/05/96	Review Letter from Laurence A. Wanshel via fax and mail	.25
09/05/96	Review asset search report	.75
09/06/96	Letter to Bank	.25
09/12/96	Prepare Re-Notice of Hearing	.35
10/03/96	Preparation for and attendance at hearing on Motion for Proceedings Supplementary	2.50
10/07/96	Fax to Laurence A. Wanshel	.25
10/07/96	Prepare Order Granting Plaintiff's Motion For Proceeding's Supplementary and Order to Show Cause; Forward to Court	.50
10/07/96	Review Fax from Laurence A Wanshel	.25
10/09/96	Review Order Granting Plaintiff's Motion for Proceeding's Supplementary and Order to Show Cause	.10
10/15/96	Letter to Bank	.25
10/28/96	Letter to Bank	.25
10/28/96	Review Supplemental Defendants' Response to Order to Show Cause together with Exhibits	1.00
11/21/96	Review Letter from bank	.25
12/05/96	Prepare Notice of Hearing and Order of Levy and Execution	.50
01/09/96	Review Fax from Laurence A. Wanshel	.25
01/07/97	Preparation for and attendance at Hearing on Order to Show Cause; Prepare proposed Order	2.50
01/13/97	Fax to Bank	.25
01/13/97	Prepare Notice of Hearing	.35
01/13/97	Review letter from Wanshel; re: Payments	.25
01/21/97	Review letter from Wanshel	.25
01/22/97	Letter to Wanshel; acceptance of settlement offer	.75
01/23/97	Review Fax from Wanshel; Acceptance of Agreement	.25

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01/31/97	Review letter from Wanshel; Request for partial Satisfaction of Judgment;	.25
02/12/97	Prepare Notice of Dismissal with Prejudice as to Leon H. Acor Only	.50
02/12/91	Prepare Partial Satisfaction of Judgment as to Leon H, Acor; Letter to Bank with payment from defendant	.65
02/18/97	Review Letter via fax from Laurence A. Wanshel	.25
02/19/97	Review correspondence from Wanshel	.25
02/24/97	Review correspondence from Bank	.25
02/25/97	Prepare Voluntary Dismissal of Proceedings Supplemental in Aid of Execution	.50
12/29/97	Correspondence to Bank	.25
03/02/98	Review letter from Bank; Review file; Conference with Bank	.65
11/27/00	Prepare status report to Bank	.50
05/24/01	Review file	.50
06/22/01	Letter to Bank	.25
06/28/01	Conference with Bank	<u>.25</u>

Total Hours 24.05

24.05 @ \$110.00 = \$2,645.50

Re: Barnett Bank of South Florida, N.A. vs. Design Home Remodeling, et al.

## For Professional Services Rendered:

01/29/87	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Conference with Bank officer	3.00
02/04/87	Prepare Complaint Letter to Bank	2.00
02/10/87	Review correspondence from Bank; Review executed Complaint	.50
02/13/87	Review file; Prepare Summonses; Conference with process server; Forward to Court	.75
02/17/87	Conference with Bank officer; Conference with process server re: address for Defendants	.50
02/19/87	Review returns of service	.25
02/19/87	Conference with Bank officer	.25
02/26/87	Prepare Nonmilitary Affidavit; Letter to Bank	.75
02/27/87	Review correspondence from Bank; Review executed Affidavit	.25
03/04/87	Prepare letter to Bank	.25
03/12/87	Prepare Motion/Order of Default; Forward to Court	.75
03/19/87	Letter to Bank with Order Default	.25
03/19/87	Review file; Prepare Plaintiff's Affidavit; Letter to Bank	1.00
03/25/87	Review executed Affidavit	.15
03/26/87	Prepare Affidavit in Support of Attorney's Fees; Affidavit of Costs; Motion for Final Judgment; Proposed Final Judgment; Forward to Court	3.50
04/01/87	Review Final Judgment After Default	.10
04/07/87	Letter to Clerk certifying and recording Final Judgment; Prepare Execution; Letter to Clerk forwarding Execution to Sheriff	1.00
04/07/87	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter Review original certified and recorded Final Judgment; Letter to Bank	1.50
04/10/87	Conferences with process server; Review returns of service from process server	.35
04/21/87	Review return of service from Sheriff's office re: docketing of execution	.50
04/22/87	Review Execution	.10
05/04/87	Preparation for deposition of Defendant	1.00
05/14/87	Review Certificate of Non-Appearance	.15

BB v Design Home

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06/23/87	Prepare Notice Preceeding Writ of Bodily Attachment; Prepare Notice of Hearing; Prepare Motion For Writ of Bodily Attachment and Sanctions; Forward to Court	2.00
06/23/87	Prepare Letter to Bank	.25
07/02/87	Review Order on Notice Preceeding Issuance of Writ of Bodily Attachment	.10
07/13/87	Preparation for and attendance at deposition of Harold Edelstein	2.00
06/28/88	Review letter from Bank	.25
08/05/88	Review letter from Bank	.25
06/20/94	Prepare Letter to Clerk of Court; Re-Recording of Final Judgment	.25
06/08/95	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
06/15/95	Conferences with process server; Review returns of service from process server	.50
06/28/95	Prepare Letter to Louis Grilla	.25
08/14/95	Prepare Rule to Show Cause; Forward to Court	.50
07/17/96	Prepare 2 <sup>nd</sup> Rule to Show Cause; Forward to Court	.25
07/21/96	Review Certificate of Non-Appearance	.15
07/30/96	Review Letter from Judge Goldstein i.e. court file destroyed	.25
08/12/96	Prepare Letter to Judge Goldstein with copies of various pleadings	1.00
08/16/96	Review issued Rule To Show Cause by Judge Goldstein;	.25
09/05/96	Conferences with process server; Review returns of service from process server	.50
09/16/86	Preparation for and attendance at deposition of Luis Grilla	2.00
09/18/96	Prepare letter to Bank	.25
12/12/96	Prepare Motion For Continuing Writ of Garnishment and Writ of Garnishment	1.00
12/31/96	Review Letter from Home Emergency Services	.25
01/06/97	Prepare letter to Home Emergency Services	.25
01/16/97	Prepare Notice to Defendants and Other Interested Parties	.50
12/12/97	Prepare Letter to Bank with payment from trust account;	.25
03/03/99	Conference with Bank; Facsimile to Bank	.35
11/27/00	Status Report to Bank	.50
05/24/01	Review file	.50
05/29/01	Prepare Letter to Bank	<u>.25</u>

Total Hours 35.30

35.30 @ \$110.00 = \$3,883.00

Re: Barnett Bank of South Florida, N.A. vs. Golden Razor Barber Shop, et al.

For Professional Services Rendered:

05/08/87	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Conference with Bank officer	3.00
05/20/87	Prepare Complaint Letter to Bank	2.00
05/27/87	Review correspondence from Bank; Review executed Complaint	.50
05/29/87	Review file; Prepare Summonses; Conference with process server; Forward to Court	.75
06/02/87	Conference with Bank officer; Conference with process server re: address for Defendants	.50
06/10/87	Review returns of service Conference with Bank officer	.25 .25
06/11/87	Prepare Nonmilitary Affidavit; Letter to Bank	.75
06/15/87	Review correspondence from Bank; Review executed Affidavit	.25
06/29/87	Prepare Motion/Order of Default; Forward to Court	.75
07/13/87	Letter to Bank with Order Default	.25
07/13/87	Review file; Prepare Plaintiff's Affidavit; Letter to Bank	1.00
07/22/87	Review executed Affidavit	.15
07/22/87	Prepare Affidavit in Support of Attorney's Fees; Affidavit of Costs; Motion for Final Judgment; Proposed Final Judgment; Forward to Court Review original loan documents from Bank; Prepare Notice of Filing	3.50 .75
08/12/87	Letter to Clerk certifying and recording Final Judgment; Prepare Execution; Letter to Clerk forwarding Execution to Sheriff	1.00
08/12/87	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
08/17/87	Review return of service from Sheriff's office re: docketing of execution	.10
08/24/87	Conferences with process server; Review returns of service from process server	.50
09/04/87	Review Letter from Correct Credit Company	.25
09/08/87	Prepare Letter to Bank; copy of Letter from Correct Credit Company	.25
09/09/87	Preparation for and attendance at deposition of Defendant	2.00
09/09/87	Review Certificate of Non-Appearance	.10
09/18/87	Prepare Letter to Correct Credit Company	.25



BB v Golden Razor / Brancaccio

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10/02/87	Prepare Contempt Notice, Motion and Notice of Hearing	1.00
11/19/87	Prepare Notice Preceding Issuance of Writ of Bodily Attachment	.75
12/04/87	Review Executed Notice Preceding Issuance of Writ of Bodily Attachment	.10
01/27/88	Prepare Letter to Judge Simmons; Prepare Writ of Bodily Attachment	1.00
03/08/88	Prepare Letter to Sheriff with three certified Writs of Bodily Attachment	.25
03/08/88	Prepare Letter to Clerk with Writs of Bodily Attachment	.25
03/17/88	Review return of service from Sheriff's office	.10
03/29/88	Prepare Notice of Taking Deposition	.35
05/24/88	Prepare Order Directing Disbursement of Funds in Court Registry in favor of Kris Penzell, Esquire; Motion for Order Directing the Funds in the Court Registry in Favor of Plaintiff or its Counsel	.75
06/03/88	Review executed Order Directing Disbursement of Funds in Court Registry in Favor of Kris Penzell, Esquire	.50
07/18/88	Prepare Letter to Bank with payment	.25
01/24/89	Prepare Motion for Garnishment After Judgment; Writ of Garnishment; Motion for Default After Garnishment;	1.25
12/30/88	Review Return of Service	.10
01/27/89	Review Notice of Default Not Entered	.25
01/27/89	Prepare 2 <sup>nd</sup> Motion after Default after Garnishment	.50
02/01/89	Review Return of Service	.10
02/07/89	Review Answer to Writ of Garnishment and Motion for Garnishment After Judgment	.50
06/20/94	Prepare Letter to Clerk for Re-recording of Judgment	.25
06/08/95	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
06/14/95	Conferences with process server; Review returns of service from process server	.50
06/28/95	Prepare Letter to Carmine Brancaccio	.25
07/19/95	Preparation for and attendance at deposition of Defendant	2.00
03/16/01	Review file	.25
05/29/01	Letter to Bank	.25

33.60 @ \$110.00 = \$3,696.00

Total Hours 33.60

Re: Barnett Bank of South Florida, N.A. vs. Thomas Kenworthy

## For Professional Services Rendered:

05/02/85	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Conference with Bank officer	3.00
05/07/85	Prepare Complaint Letter to Bank	2.00
05/15/85	Review correspondence from Bank; Review executed Complaint	.50
05/15/85	Review file; Prepare Summonses; Conference with process server; Forward to Court	.75
05/22/85	Conference with Bank officer; Conference with process server re: address for Defendants	.50
05/27/85	Review returns of service	.25
05/28/85	Conference with Bank officer	.25
05/29/85	Prepare Nonmilitary Affidavit; Letter to Bank	.75
05/31/85	Review correspondence from Bank; Review executed Affidavit	.25
06/11/85	Prepare Motion/Order of Default; Forward to Court	.75
06/13/85	Review file; Prepare Plaintiff's Affidavit; Letter to Bank	1.00
06/14/85	Review Answer to complaint	.15
06/19/85	Review file; Re-draft file Plaintiff's Affidavit to bank; Letter to bank	1.00
06/25/85	Prepare Affidavit in Support of Attorney's Fees; Cost Affidavit; and Motion for Summary Judgment	2.00
06/25/85	Review executed Affidavit	.15
06/25/85	Prepare Notice of Hearing	.35
07/16/85	Review Motion to Set Aside Default; Review Notice of Hearing; Letter to bank	.75
08/05/85	Review Answer to complaint; Review Motion to Dismiss; Review Notice of Hearing	1.00
08/06/85	Letter to bank	.25
02/14/86	Prepare Supplemental Plaintiff's Affidavit; Prepare Renewed Motion Summary Judgment; Letter to bank	1.50
04/16/86	Prepare Notice of Hearing	.35
05/15/86	Review Affidavit; Prepare Notice of Non-Jury Trial; Letter to bank; Conference with Bank	1.00
06/17/86	Prepare Agreed Final Judgment; Forward to Court;	.35
07/08/86	Review Agreed Final Judgment entered by Court	.10
07/23/86	Letter to Clerk certifying and recording Final Judgment; Prepare Execution; Letter to Clerk forwarding Execution to Sheriff	1.00

BB v. Kenworthy

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07/24/86	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
07/28/86	Review return of service from Sheriff's office re: docketing of execution	.10
09/29/86	Conferences with process server; Review returns of service from process server	.50
09/25/86	Preparation for and attendance at deposition of Defendant	2.00
08/16/86	Letter to Bank	.25
10/08/86	Preparation for and attendance at deposition of Defendant	2.00
10/21/86	Letter to Bank with monies	.25
12/09/86	Letter To Bank	.25
08/16/95	Letter to Bank with copy of Final Judgment	.25
05/29/01	Letter to Bank	<u>.25</u>

Total Hours 27.30

27.30@ \$110.00 = \$3,003.00

Re: Barnett Bank of South Florida, N.A. vs. Metropolitan Industries (Ward, James)

## For Professional Services Rendered:

04/19/88	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Conference with Bank officer	3.00
04/21/88	Prepare Complaint Letter to Bank	2.00
04/23/88	Review correspondence from Bank; Review executed Complaint	.50
04/22/88	Review file; Prepare Summonses; Conference with process server; Forward to Court	.75
05/09/88	Review returns of service; Conference with Bank; Prepare Amended Complaint; Forward to Court	1.50
05/17/88	Prepare Non-Military Affidavit; Letter to Bank	.75
05/31/88	Review Non-Military Affidavit;	.10
06/15/88	Prepare Motion/Order for Default; Forward to court	.75
06/16/88	Conferences with Defendant; Conferences with Bank; Prepare Stipulation for Settlement	1.50
07/18/88	Letter to bank; enclosed payment from trust account	.25
08/29/88	Letter to bank; enclosed payment from trust account	.25
09/20/88	Letter to bank; enclosed payment from trust account	.25
10/10/88	Prepare Plaintiff's Affidavit; Letter to Bank	1.00
10/20/88	Prepare Motion for Entry of Final Judgment; Affidavit of Costs; Affidavit of Attorney's Fees; Prepare proposed Final Judgment; Forward to Court	3.50
11/04/88	Letter to Clerk certifying and recording Final Judgment; Prepare Execution; Letter to Clerk forwarding Execution to Sheriff	1.00
11/07/88	Prepare Motion for Attorneys Fees; Notice of Hearing	.75
11/14/88	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
11/16/88	Review original certified and recorded Final Judgment; Letter to Bank	.35
11/16/88	Conferences with process server; Review returns of service from process server	.50
11/21/88	Review return of service from Sheriff's office re: docketing of execution	.10
12/18/88	Review Certified and Recorded Final Judgment	.10
12/19/88	Letter to Bank	.25
12/21/88	Prepare Notice of Hearing	.35
01/12/89	Prepare Re-Notice of Hearing (Special Setting)	.35

BB v Metropolitan Ward

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01/20/89	Letter to Bank	
03/21/89	Prepare Agreed Order Awarding Attorneys Fees;	.25
03/28/89	Review Agreed Order Awarding Attorney's Fees Signed by Judge	.35
03/30/89	Letter to Bank	.10
09/05/89	Review Stipulation and Order for Withdrawal of Counsel and Order Approving Substitution of Counsel; letter from attorney Sigars	.25
11/27/00	Status report to Bank	.65
05/21/01	Prepare 3 PO Changes for James Ward	.50
05/23/01	Prepare Notice of Taking Deposition and Subpoena Duces Tecum for Deposition; Conference with process server; Forward to Court	.30
05/28/01	Review return of service	1.50
05/29/01	Conference with Defendant; Correspondence to Defendant	.10
06/25/01	Review Defendant's financial information; Forward to Bank	.50
06/27/01	Review memo regarding call from Defendant; Conference with Court reporter	.65
07/06/01	Conference with Bank	.35
		<u>.25</u>

Total Hours 27.10

27.10 @ \$110.00 = \$2,981.00

Re: Barnett Bank of South Florida, N.A. vs. Ricardo Rios

## For Professional Services Rendered:

08/23/84	Review correspondence from Bank; Review bank transmittal;	
08/27/84	Review Bank documents; Conference with Bank officer	3.00
	Prepare Complaint	
	Letter to Bank	
08/31/84	Review correspondence from Bank; Review executed	2.00
	Complaint	
08/31/84	Review file; Prepare Summonses; Conference with process	.50
	server; Forward to Court	
08/31/84	Conference with Bank officer; Conference with process server	.75
	re: address for Defendants	
09/03/84	Review returns of service	.50
09/06/84	Conference with Bank officer	.25
09/06/84	Prepare Nonmilitary Affidavit; Letter to Bank	.25
09/10/84	Review correspondence from Bank; Review executed Affidavit	.75
09/19/84	Review letter from Bank	.25
09/20/84	Prepare Motion/Order of Default; Forward to Court	.25
10/01/84	Letter to Bank with Order of Default	.75
10/01/84	Review file; Prepare Plaintiff's Affidavit; Letter to Bank	.25
11/15/84	Review executed Affidavit	1.00
11/15/84	Prepare Affidavit in Support of Attorney's Fees; Affidavit of	.15
	Costs; Motion for Final Judgment; Proposed Final Judgment;	
	Forward to Court	
12/03/84	Letter to Clerk certifying and recording Final Judgment;	3.50
	Prepare Execution; Letter to Clerk forwarding Execution	
	to Sheriff	
12/12/84	Prepare Notice of Taking Deposition in Aid of Execution; Prepare	.75
	Subpoenas Duces Tecum for Deposition in Aid of Execution;	
	Conference with process server; Conference with Court Reporter	1.50
12/18/84	Conferences with process server; Review returns of no service	
	from process server	
12/18/84	Letter to Bank; unable to serve defendant	.50
12/28/84	Letter to Clerk; re: Recorded Judgment	.25
01/07/85	Review original certified and recorded Final Judgment;	.25
01/08/85	Letter to Clerk for certification and recording of final judgment;	.10
01/09/85	Letter to Clerk; Forward Execution to Sheriff;	.25
01/21/85	Letter to bank	.25
07/07/85	Review correspondence from Clerk	.25
		.25

Re: Nationsbank, N.A. v. Ramdata Inc. and Richard Ramos

For Professional Services Rendered:

01/12/99	Review file; Conference with Bank	
02/18/99	Review correspondence from Bank; Review bank transmittal;	1.00
02/23/99	Review Bank documents; Conference with Bank officer	
	Prepare Complaint	3.00
	Letter to Bank	
03/10/99	Review correspondence from Bank; Review executed	2.00
	Complaint	
03/10/99	Review file; Prepare Summonses; Conference with process	.25
	server; Forward to Court	
03/12/99	Conference with Bank officer; Conference with process server	.75
	re: address for Defendants	
03/25/99	Review returns of service; Conference with Bank officer	.75
03/25/99	Prepare Nonmilitary Affidavit; Letter to Bank	.35
03/31/99	Review correspondence from Bank; Review executed Affidavit	.75
04/07/99	Prepare Motion/Order of Default; Forward to Court	.25
04/19/99	Review correspondence from Default Clerk	.75
04/30/99	Redraft Motion/Order of Default; Forward to Court	.25
05/17/99	Review correspondence from Default Clerk	.75
05/21/99	Redraft Motion/Order of Default; Forward to Judge	.25
06/10/99	Review Order of Default entered by Judge	.75
06/17/99	Letter to Bank with Default	.10
06/17/99	Review file; Prepare Plaintiff's Affidavit; Letter to Bank	.25
07/13/99	Review executed Affidavit	1.00
07/13/99	Prepare Affidavit in Support of Attorney's Fees; Affidavit of	.10
	Costs; Motion for Final Judgment; Proposed Final Judgment;	
	Forward to Court	
08/11/99	Letter to Clerk certifying and recording Final Judgment;	3.50
	Prepare Execution; Letter to Clerk forwarding Execution	
	to Sheriff	
08/11/99	Prepare Notice of Taking Deposition in Aid of Execution; Prepare	1.00
	Subpoenas Duces Tecum for Deposition in Aid of Execution;	
08/20/99	Conference with process server; Conference with Court Reporter	1.50
	Review return of service from Sheriff's office re: docketing of	
	execution	
08/23/99	Conferences with process server; Review returns of service	.10
	from process server	
09/20/99	Conference with Bank; Review correspondence from Bank	.75
09/21/99	Preparation for deposition of Defendant	1.25
		.75

NB v Ramdata / Ramos

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10/12/99	Review Certificate of Non-Appearance Richard Ramos	.25
10/18/99	Prepare Rule to Show Cause; Forward to Court	.75
11/01/99	Prepare Motion for Order of Contempt of Notice of Hearing	.75
11/17/99	Review Order on Rule to Show Cause	.10
11/19/99	Conference with process server	.10
12/02/99	Review Fax from Michael A. Frank, Esquire and Suggestion of Bankruptcy	.50
02/07/00	Review Order Confirming Uncontested Amended Chapter 13 Plan	.25
06/08/00	Letter to Bank re: Bankruptcy	.25
06/29/00	Letter to Bank	.25
03/02/01	Letter to trustee	.25
05/03/01	Review file	.50
05/24/01	Letter to Bank	<u>.25</u>

Total Hours 26.35

26.35 @ \$110.00 = \$2,898.50



Re: Barnett Bank of South Florida, N.A. vs. M & R Latin American and Mazon

For Professional Services Rendered:

07/05/85	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Conference with Bank officer	3.00
07/10/85	Prepare Complaint Letter to Bank	2.00
07/23/85	Review file; Prepare Summonses; Conference with process server; Forward to Court	.75
07/24/85	Conference with Bank officer; Conference with process server re: address for Defendants	.50
08/01/85	Review returns of service	.25
08/01/85	Conference with Bank officer	.25
08/01/85	Prepare Nonmilitary Affidavit; Letter to Bank	.75
08/19/85	Review correspondence from Bank; Review executed Affidavit	.25
08/19/85	Prepare Motion/Order of Default; Forward to Court	.75
08/20/85	Prepare Letter to Bank with Order Default	.25
08/29/85	Review file; Prepare Plaintiff's Affidavit; Letter to Bank	1.00
09/04/85	Review executed Affidavit	.15
09/19/85	Prepare Affidavit in Support of Attorney's Fees; Cost Affidavit; Motion for Final Judgment; Proposed Final Judgment; Forward to Court	2.50
10/10/85	Review Answer from Defendant	.50
10/10/85	Prepare 2 <sup>nd</sup> Plaintiff's Affidavit; Letter to Bank	.75
10/16/85	Prepare Letter to bank; Prepare Motion Summary Judgment	1.50
10/11/85	Prepare Notice of Hearing (Special Appointment)	.35
12/17/85	Review Notice of Change of Address and Phone Number	.25
12/18/85	Prepare Notice of Hearing (Specially Set)	.35
01/16/86	Review original Bank documents; Prepare Notice of Filing	.75
01/16/86	Preparation for and attendance at Plaintiff's Motion for Summary Judgment; Prepare Order	2.50
01/22/86	Prepare Letter to Clerk certifying and recording Final Judgment; Prepare Execution; Letter to Clerk forwarding Execution to Sheriff	1.00
02/12/86	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
02/26/86	Conferences with process server; Review returns of service from process server	.50
03/18/86	Preparation for and attendance at deposition of Defendant	2.00
03/25/86	Review return of service from Sheriff's office re: docketing of execution	.10

BB v M &amp; R Latin American Mazon

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04/16/86	Review Letter from Leo E. De La Pena, Esq.	.25
04/21/86	Prepare Letter to Bank in reference to letter from attorney	.25
07/03/86	Letter to Bank with results of deposition	.50
07/31/87	Review Letter from Bank	.25
08/18/87	Review Letter from Bank	.25
09/15/87	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
09/18/87	Prepare Notice of Hearing and Motion for Attorney's Fees	.75
09/21/87	Conferences with process server; Review returns of service from process server	.50
10/21/87	Prepare Order Granting Reasonable Attorney's Fees	.35
10/26/87	Prepare Re-Notice of Taking Deposition	.25
10/23/87	Review Letter from Bank	.25
11/02/87	Review Certificate of Non-Appearance	.10
12/09/88	Review Defendants bankruptcy notice; Prepare Complaint Objecting to Dischargeability of Debt; Cover sheet and summonses	3.00
12/16/88	Review Letter from Renato Perez, Esquire	.25
01/03/89	Review Debtors'/Defendants' Answer and Affirmative Defenses	.75
01/04/89	Prepare Letter to Bank with copy of Complaint Objecting to Dischargeability of Debt prepared by our office along with Defendants' Answer and Affirmative Defenses	.25
01/06/89	Prepare Notice of Hearing	.25
01/09/89	Review Order Setting Deadline for Filing Bankruptcy Rule 1019(6) Claims	.25
01/17/89	Review Agreed-to Motion for Continuance and Order Re-Setting Pre-Trial Conference	.25
01/26/89	Prepare Letter to Bank with copy if Agreed Motion and Order Re-setting Pre-Trial Conference	.35
02/08/89	Review Notice of Taking Deposition	.25
02/08/89	Review Amended Motion to Withdraw as Counsel for Debtors	.35
02/09/89	Prepare Letter to Bank	.25
02/13/89	Prepare Re-Notice of Hearing	.35
02/23/89	Review Notice of Taking Deposition; Review Debtor's Notice of Abandonment and Withdrawal of Undersigned's Counsel Previous Motion to Withdraw as Counsel for Debtors;	1.00
03/20/89	Prepare Pre-trial Order and Order Setting Cause for Trial; Unilateral Pre-trial Pre-trial Statement;	2.00
03/23/89	Review Pre-trial Order and Order Setting Cause for Trial	.25
03/23/89	Prepare Letter to Bank	.25

BB v M &amp; R Latin American Mazon

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03/27/89	Prepare Amended Unilateral Pre-trial Statement; Agreed Motion to Amend Unilateral Pre-Trial Statement; Agreed Order Granting Leave to Amend Unilateral Pre-trial Statement; forward to court	1.75
03/29/89	Review Agreed Order Granting Leave To Amend Unilateral Pre-trial Statement	.25
03/30/89	Prepare 3 Subpoena's for United States Bankruptcy Court	.50
03/31/89	Conferences with process server; Review returns of service from process server	.50
04/27/89	Prepare Letter to Bank	.25
04/27/89	Prepare Letter to Jaime Austrich;	.25
05/04/89	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter BKC Court	1.50
05/12/89	Review Debtors'/Defendants' Answer and Affirmative Defenses to Plaintiff's Amended Complaint	.75
05/18/89	Prepare Reply to Affirmative Defenses; Letter to Bank	.75
05/19/89	Preparation for and attendance at deposition of Bank officer	2.00
05/30/89	Prepare for and attend deposition of Domingo Mazon	3.00
06/05/89	Review transcript of deposition of Domingo Mazon	1.00
06/08/89	Prepare Amended Complaint Objecting to Dischargeability of Debt; Prepare Findings of Fact and Conclusions of Law; and Plaintiff's Opening Statement; Forward to Court	6.00
06/08/89	Prepare Final Judgment	.25
06/19/89	Review entered Final Judgment	.10
06/26/89	Prepare Letter to Bank	.25
06/27/95	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
06/29/95	Conferences with process server; Review returns of no service from process server	.50
02/21/97	Review of file; Conference with Bank	1.00
05/24/01	Review file	.50
	<u>Total Hours</u>	<u>62.30</u>

62.30@ \$110.00 = \$6,853.00

Re: Nationsbank, N.A. vs. The Supernet Online/ Michael Man-Gue

For Professional Services Rendered:

11/03/99	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Conference with Bank officer	3.00
11/05/99	Prepare Complaint Letter to Bank	2.00
11/16/99	Review correspondence from Bank; Review executed Complaint	.50
11/29/99	Review file; Prepare Summonses; Conference with process server; Forward to Court	.75
12/20/99	Prepare PO request for change of address information	.10
12/27/99	Review PO request for change of address information	.10
02/16/00	Conference with Bank officer; Conference with process server re: address for Defendants	.50
02/17/00	Review returns of no service	.25
06/11/00	Review file; Conference with Bank	.75
08/01/00	Prepare Plaintiff's Motion To Extend Time for Service of Process and Order Granting Motion to Extend Time for Service of Process Ex-Parte	1.00
08/11/00	Review signed Order Granting Motion to Extend Time for Service of Process	.10
08/15/00	Prepare Notice of Action(Constructive Service); Notice of Action for Publication and Affidavit of Diligent Search;	1.25
09/27/00	Prepare Non-Military Affidavit; letter to bank	.75
10/12/00	Prepare Proof of Publication with Notice of Action; Forward court	1.00
10/12/00	Prepare Motion/Order for Default	.75
10/19/00	Review Default not entered and returned from clerk of court	.25
10/24/00	Prepare new Motion for Default and Notice of Hearing	.75
08/22/00	Prepare 3 PO Request for change of address information	.30
11/14/00	Prepare Supplemental Affidavit Re Due Diligence	.50
11/16/00	Preparation for and attendance at Plaintiff's Motion for Default; Prepare Order granting Plaintiff's Motion for Default	2.25
11/22/00	Prepare Plaintiff's Affidavit; letter to bank	1.00
11/27/00	Prepare 2 <sup>nd</sup> Motion/Order of Default; Letter to Judge	1.00
11/27/00	Review correspondence from Bank; Review executed Affidavit	.25
12/04/00	Review signed Order of Default	.10
12/12/00	Prepare Affidavit of Attorneys Fees; Prepare Plaintiff's Motion for Final Judgment After Default; Affidavit of Costs and proposed Final Judgment	3.50

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01/16/01	Letter to Clerk certifying and recording Final Judgment; Prepare Execution; Letter to Clerk forwarding Execution to Sheriff	1.00
01/25/01	Review correspondence from Clerk's office	.25
02/08/01	Review original certified and recorded Final Judgment; Letter to Bank	.35
02/19/01	Review return of service from Sheriff's office re: docketing of execution	.10
07/27/01	Letter to Bank	<u>.25</u>

Total Hours 24.65

24.65@ \$110.00 = \$2,711.50

Re: Barnett Bank of South Florida, N.A. vs. Lioy, Antonio

For Professional Services Rendered:

09/12/86	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Conference with Bank officer	3.00
09/15/86	Prepare Complaint Letter to Bank	2.00
09/22/86	Review file; Prepare Summonses; Conference with process server; Forward to Court	.75
09/24/86	Conference with Bank officer; Conference with process server re: address for Defendants	.50
10/02/86	Review returns of service	.25
10/02/86	Conference with Bank officer	.25
10/07/86	Conference with Defendant; Conference with Bank; Prepare Stipulation for settlement; Letter to Bank	2.00
10/23/86	Prepare Nonmilitary Affidavit; Letter to Bank	.75
10/28/86	Review correspondence from Bank; Review executed Affidavit	.35
10/29/86	Prepare Motion/Order for Default; Forward to Court	.75
11/10/86	Review file; Prepare Plaintiff's Affidavit; Letter to Bank	1.00
11/20/86	Prepare Final Judgment of Foreclosure after Default Coast Affidavit; Motion for Final Judgment of Foreclosure Affidavit in Support of Attorneys Fees; Forward to Court	3.50
12/08/86	Letter to bank	.25
03/05/87	Review original loan documents from Bank; Prepare Notice of Filing	.75
04/21/88	Prepare Affidavit of Attorneys Fees; Letter to Judge	.75
5/06/88	Review Final Judgment of Foreclosure after default	.10
05/10/88	Letter to Bank	.25
06/01/88	Conference with Bank; Attendance at foreclosure sale	1.00
06/16/88	Review Letter from Clerk of Court	.25
06/18/88	Review Certificate of Sale, Certificate of Title, Certificate of Disbursements and correspondence from clerk; Letter to bank	.65
06/20/88	Letter to bank with disbursements	.25
09/16/88	Prepare Motion for Deficiency of Decree and Affidavit; Letter to bank	1.50
09/24/88	Review executed Affidavit	.10
09/29/88	Prepare Notice of Hearing	.35
10/05/88	Prepare Re-Notice of Hearing	.30
10/24/88	Preparation for and attendance at Motion for Deficiency Decree; Prepare proposed Order	2.00
10/24/88	Review Deficiency Decree signed by Judge	.10

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10/23/88	Letter to Clerk certifying and recording Final Judgment; Prepare Execution; Letter to Clerk forwarding Execution to Sheriff	1.00
10/31/88	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
11/15/88	Letter to Caplan to prepare skip trace on defendant	.25
12/13/88	Review report on Defendant; Forward to Bank	1.00
12/13/88	Conferences with process server; Review returns of no service from process server	.50
08/16/95	Conference with Bank; Review file; Letter to Bank	.50
12/07/00	Status report to Bank	.50
04/30/01	Prepare Requests for Post Office Change of Address Information	.30
05/25/01	Letter to Bank	<u>.25</u>

Total Hours 29.50

29.50 @ 110.00 = \$3,245.00

Re: Barnett Bank of South Florida, N.A. v. Jeni L. Jayson

## For Professional Services Rendered:

05/05/89	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Conference with Bank officer	3.00
05/09/89	Prepare Complaint Letter to Bank	2.00
05/16/89	Review correspondence from Bank; Review executed Complaint	.50
05/16/89	Review file; Prepare Summonses; Conference with process server; Forward to Court	.75
05/19/89	Conference with Bank officer; Conference with process server re: address for Defendants	.50
05/31/89	Review returns of service	.25
06/29/89	Conference with Bank	.25
07/05/89	Review letter from bank in reference to defendant	.25
07/14/89	Conference with process server re: address for Defendants	.50
08/18/89	Prepare Nonmilitary Affidavit; Letter to Bank	.75
08/28/89	Review correspondence from Bank; Review executed Affidavit	.25
08/29/89	Prepare Motion/Order for Default; Forward to Court	.75
09/08/89	Review signed Order of Default	.25
09/13/89	Letter to bank with payment from defendant	.25
09/25/89	Review correspondence from Defendant	.50
11/03/89	Review file; Prepare Plaintiff's affidavit; Letter to bank	1.00
11/20/89	Prepare Final Judgment; Motion for Final Judgment after Default; Affidavit of Costs; Plaintiff's Affidavit; Motion for Default; Forward to Court	3.50
11/30/89	Review signed Final Judgment	.10
12/07/89	Letter to Clerk certifying and recording Final Judgment; Prepare Execution; Letter to Clerk forwarding Execution to Sheriff	1.00
12/07/89	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
12/14/89	Review return of service from Sheriff's office re: docketing of execution	.10
01/09/90	Conferences with process server; Review returns of service from process server	.50
01/10/90	Preparation for and attendance at deposition of Defendant	2.00



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02/01/90	Prepare Motion to Award Attorneys Fees	.50
02/22/90	Letter to Bank with Payment from defendant	.25
03/26/90	Letter to Bank with Payment from defendant	.25
04/19/90	Letter to Bank with Payment from defendant	.25
05/10/90	Letter to Bank with Payment from defendant	.25
05/29/90	Review correspondence from defendant	.25
05/30/90	Letter to Bank in reference to Jeni Jayson's correspondence	.25
07/26/90	Letter to Bank with Payment from defendant	.25
08/29/90	Letter to Bank with Payment from defendant	.25
09/20/90	Letter to Bank with Payment from defendant	.25
12/20/90	Letter to Bank with Payment from defendant	.25
01/24/91	Letter to Bank with Payment from defendant	.25
08/16/91	Letter to Bank with Payment from defendant	.25
10/28/91	Letter to Bank with Payment from defendant	.25
12/09/91	Letter to Bank with Payment from defendant	.25
03/25/92	Letter to Bank with Payment from defendant	.25
04/27/92	Letter to Bank with Payment from defendant	.25
09/04/92	Letter to Bank with Payment from defendant	.25
01/07/93	Letter to Bank with Payment from defendant	.25
06/27/95	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
09/13/95	Review return of service; Letter to Defendant	.25
09/19/05	Review correspondence from Defendant	.25
09/22/95	Letter to Bank; copy of correspondence from Jeni Jayson; payment from debtor	.25
09/27/95	Review estoppel information from Bank	.25
11/15/95	Letter to Bank with Payment from defendant	.25
12/13/95	Prepare Re-Notice of Taking Deposition	.35
07/16/96	Prepare Re-Notice of Taking Deposition	.35
08/14/96	Prepare Re-Notice of Taking Deposition	.35
02/02/98	Review Correspondence from Bank	.75
02/11/98	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
02/11/98	Prepare three PO Request for Change of address information	.30
03/20/98	Review Request for Change of address information from post office	.30
03/25/98	Letter to Bank; Unable to effect service on defendant	.25
04/08/98	Review File; Memo to File	.50

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05/26/98	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
06/09/98	Review returns of service	.10
08/11/98	Letter to bank with payment from defendant	.25
08/30/98	Review correspondence from Defendant	.25
10/02/98	letter to bank with payment from defendant	.25
10/27/98	letter to bank with payment from defendant	.25
05/18/99	Prepare Re-Notice of Deposition	.35
09/04/99	letter to bank with payment from defendant	.25
12/07/00	Prepare Status Report for Bank	.50
04/05/01	Prepare PO Request for Change of address information	.10
04/30/01	Review response re PO Request for Change of address	.10
05/07/01	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
06/07/01	Conference with process server	.15
06/14/01	Review Certificate of Non-Appearance	.10
06/27/01	Letter to Clerk for re-assignment of judge in civil division	.25
07/13/01	Review Letter from deputy clerk with re-assignment of judge in civil division	.25
07/26/01	Prepare Rule and Order to show Cause; Forward to Court	.75
08/22/01	Conference with Judge; Prepare Plaintiff's Motion for Contempt and Rule to Show Cause	1.00
09/07/01	Review executed Order; Conference with process server	.25
09/08/01	Review return of service on Order	.10
10/26/01	Prepare Motion for Writ of Bodily Attachment and Notice of Hearing	.75
11/15/01	Preparation for and attendance at hearing on Motion for Writ of Bodily Attachment; Prepare proposed Order	<u>2.50</u>

Total Hours 44.35

44.35 @ \$110.00 = \$4,878.50

Re: Nationsbank, N.A. v. Multicare Medical Supplies/Garcia, Pedro and Maria

## For Professional Services Rendered:

06/07/99	Review correspondence from Bank; Review bank documents; Conference with Bank officer	2.00
06/14/99	Prepare Complaint; Letter to Bank	2.00
06/21/99	Review executed Complaint; Prepare Summonses; Conference with process server; Forward to Court	.50
07/01/99	Review returns of service	.25
07/05/99	Prepare Nonmilitary Affidavit; Letter to Bank	.75
07/19/99	Review correspondence from Defendant	.15
07/20/99	Letter to Bank	.25
07/22/99	Review executed Affidavit	.10
07/23/99	Prepare Motion/Order of Default; Forward to court	.75
07/30/99	Review correspondence from Clerk	.25
08/02/99	Prepare Notice of Hearing and Motion for Default	.75
08/04/99	Review file; Prepare Plaintiff's Affidavit; Letter to Bank	1.00
08/10/99	Review executed Affidavit	.10
08/13/99	Prepare Motion for Judgment on the Pleadings; Affidavit of Costs; Affidavit fo Fees; Forward to Court	1.50
09/22/99	Preparation for and attendance at hearing	2.00
10/12/99	Conference with Judge; Prepare Notice of hearing - Special Appointment	.50
10/27/99	Conference with Bank	.15
11/09/99	Review documents from Bank	.50
11/22/99	Preparation for and attendance at Motion for Summary Judgment; Prepare proposed Order	2.00
11/24/04	Conference with Judge; Prepare Notice of Filing original Documents	.50
11/25/99	Prepare Execution; Letter to Clerk; Letter to Sheriff	.75
12/10/99	Prepare Notice of Taking Deposition and Subpoenas Duces Tecum; Conference with process server	.75
01/24/00	Preparation for and attendance at deposition of Pedro Garcia	2.00
01/27/00	Letter to Bank	.50
01/31/00	Conferences with Bank; Review file	.50
05/09/00	Prepare Notice of Taking Deposition and Subpoenas Duces Tecum; Conference with process server	.75
06/06/00	Preparation for and attendance at deposition of corporation	2.00
06/21/00	Letter to Bank	.25
07/04/00	Conference with Bank	.25
07/26/00	Conferences with Bank	.25
08/11/00	Letter to Bank	.25
08/28/00	Conference with Bank	.25

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09/05/00	Conference with Defendant corporation	.25
09/13/00	Conference with Defendant corporation	.25
10/03/00	Meeting with Defendant corporation regarding settlement	.50
10/19/00	Prepare Partial Satisfaction of Judgment; Letter to Bank	.50
10/27/00	Conference with Bank	.15
10/30/00	Review correspondence from Bank; Conference with Bank	.35
11/07/00	Prepare revised Release of Judgment Lien as to corporation; Letter to Bank	.50
11/10/00	Letter to Defendant with Release	<u>.25</u>
	Total Hours	27.25

$$27.25 @ 110.00 = \$2,997.50$$

Re: Barnett Bank of South Florida, N.A. vs Top Ten Card Co.

For Professional Services Rendered:

10/26/92	Review correspondence from Bank; Review bank transmittal;	2.25
10/29/92	Review Bank documents; Conference with Bank officer	2.75
04/23/92	Review asset update	.50
05/12/93	Prepare Letter to Bank	.50
06/04/93	Review credit report	.50
11/27/00	Status Report to Bank	.50
06/22/01	Prepare Letter to Bank	<u>.25</u>

Total Hours 7.25

7.25@110.00=\$797.50

Re: Nationsbank, N.A. v. The Wisteria Branch and William E. Gerald

## For Professional Services Rendered:

07/12/99	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Conference with Bank officer	3.00
07/23/99	Conference with secretary of state; Review corporate detail record from secretary of state	.25
07/23/99	Prepare Complaint; Letter to Bank	2.00
08/09/99	Review executed Complaint	.10
08/09/99	Review file; Prepare Summonses; Conference with process server; Forward to Court	.75
08/16/99	Conference with Bank officer; Conference with process server re: address for Defendants	.50
08/26/99	Conference with process server	.25
08/31/99	Review correspondence from Bank	.25
08/31/99	Review file; Conference with Bank; Request for PO change	.75
09/13/99	Conference with process server with new address	.25
10/08/99	Review response to PO change on defendant	.10
12/21/99	Review returns of no service; Letter to Bank	.25
06/16/00	Review file	.50
06/16/00	Prepare Plaintiff's Motion to Extend Time for Service of Process and Order Granting Plaintiff's Motion to Extend Time for Service of Process; Forward to Court	.75
06/28/00	Prepare Alias Summonses; Conference with process server	.50
07/10/00	Review signed order granting extension of time	.10
08/03/00	Review returns of service	.20
08/10/00	Prepare Nonmilitary Affidavit; Letter to Bank	.75
08/18/00	Review executed Affidavit from Bank	.10
08/22/00	Prepare Plaintiff's Affidavit; Letter to Bank	.50
09/12/00	Review executed Affidavit	.10
09/22/00	Prepare Motion for Summary Judgment; Affidavit of Plaintiff's Counsel as to Attorney's Fees and Affidavit of Costs	1.25
09/25/00	Forward to Court	.25
11/20/00	Conference with Judge; Letter to Judge; Prepare Order Setting Hearing for Plaintiff's Motion for Summary Judgment	1.00
12/01/00	Review signed order	.10
01/25/01	Conferences with Bank requesting original documents	.30
02/01/01	Review original documents; Prepare Notice of Filing	.50
02/02/01	Preparation for and attendance at Plaintiff's Motion for Summary Judgment; Prepare Final Summary Judgment Order	3.50

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02/07/01	Letter to Clerk certifying and recording Final Summary Judgment; Prepare Execution; Letter to Clerk forwarding Execution to Sheriff	1.00
04/02/01	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
04/03/01	Conference with process server re: address for Defendants	.25
04/13/01	Review returns of service	.10
05/03/01	Preparation for and attendance at deposition	2.50
05/21/01	Review transcript of deposition; Letter to Bank	1.00
07/11/01	Review file	<u>.25</u>

Total Hours 25.45

25.45 @ \$110.00 = \$2,799.50

Re: Barnett Bank of South Florida, N.A. vs Velma's Golden Needle

## For Professional Services Rendered:

01/25/91	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Conference with Bank officer	3.00
01/28/91	Prepare Complaint Letter to Bank	2.00
02/07/91	Review file; Review executed Complaint; Prepare Summonses; Conference with process server; Forward to Court	.75
02/11/91	Conference with Bank officer; Conference with process server re: address for Defendants	.50
03/06/91	Review returns of service	.25
03/13/91	Conference with Bank officer	.25
03/13/91	Prepare Nonmilitary Affidavit; Letter to Bank	.75
03/28/91	Review correspondence from Bank; Review executed Affidavit	.25
03/28/91	Prepare Motion/Order of Default; Forward to Court	.75
04/08/91	Review loan statements from Bank	1.00
04/10/91	Review file; Prepare Plaintiff's Affidavit; Letter to Bank	1.00
04/24/91	Review executed Affidavit	.10
04/24/91	Prepare Affidavit in Support of Attorney's Fees; Affidavit of Costs; Motion for Final Judgment; Proposed Final Judgment; Forward to Court	3.50
05/03/91	Review executed Final Judgment; Letter to Clerk certifying and recording Final Judgment; Prepare Execution; Letter to Clerk forwarding Execution to Sheriff	1.00
05/03/91	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
05/08/91	Conferences with process server; Review returns of service from process server	.50
05/23/91	Preparation for deposition of Defendant; Conferences with Defendant; Conferences with Bank	1.00
05/28/91	Review Execution and Final Judgment	.20
08/16/91	Letter to Bank	.25
10/28/91	Letter to bank with payment from trust account	.25
12/09/91	Letter to bank with payment from trust account	.25
03/09/92	Letter to bank with payment from trust account	.25
04/27/92	Letter to bank with payment from trust account	.25
06/29/92	Letter to bank with payment from trust account	.25
09/04/92	Letter to bank with payment from trust account	.25
04/16/93	Letter to bank with payment from trust account	.25
11/16/93	Letter to bank with payment from trust account	.25
03/29/94	Letter to bank with payment from trust account	.25



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12/01/94	Conference with and Fax to Barnett Bank	.50
12/23/94	Review Levy Request and report from Bank	.75
01/25/95	Letter to Sheriff; Prepare Instructions to Levy	.75
02/01/95	Review Return of Service of Execution	.10
02/16/95	Conference with Bank; Letter to Sheriff; Cancel Levy	.50
03/29/95	Letter to Bank	.25
12/07/00	Review file; Report to Bank	.35
06/21/01	Letter to Bank	<u>.25</u>

Total Hours 24.25

24.25@ \$110.00 = \$2,667.50

Re: Barnett Bank of South Florida, N.A. vs. Kiambu Chaka

## For Professional Services Rendered:

12/26/86	Review correspondence from Bank; Review bank transmittal; Review Bank documents; Conference with Bank officer	2.50
12/29/86	Review letter from Bank	.50
01/06/87	Review Letter from Bank re: Insurance	.25
01/12/87	Letter to Bank	.25
01/22/87	Review correspondence from Bank	.25
01/27/87	Review correspondences from Bank; Review title policy;	.65
01/27/87	Prepare Foreclosure Complaint; Notice of Lis Pendens; Letter to Bank	3.50
01/30/87	Review Letter from Bank re: changes to Complaint	.35
02/10/87	Review file; Prepare Summonses; Conference with process server; Forward to Court	.75
02/17/87	Conference with Bank officer; Conference with process server re: address for Defendants	.50
02/19/87	Review returns of service	.25
02/19/87	Conference with Bank officer	.25
02/26/87	Prepare Nonmilitary Affidavit; Letter to Bank	.75
03/06/87	Review correspondence from Bank; Review executed Affidavit	.25
03/12/87	Prepare Motion/Order of Default; Forward to Court	.75
03/18/97	Review Default	.25
03/19/97	Review file; Prepare Plaintiff's Affidavit; Letter to Bank	1.00
04/02/87	Review executed Affidavit	.10
04/06/87	Prepare Affidavit in Support of Attorney's Fees; Affidavit of Costs; Motion for Final Judgment; Proposed Final Judgment of Foreclosure; Forward to Court	3.50
04/08/87	Letter to Jeff Feuer, Esquire	.25
04/10/87	Review Letter from Bank	.25
04/13/87	Review Letter to Dade County Tax Collector	.25
04/15/87	Review Letter from Bank	.25
04/17/87	Review Letter from Jeffrey Feuer, Esquire	.25
04/18/87	Review Letter from Bank	.25
04/20/87	Letter to defendant	.25
04/20/87	Letter to bank	.25
04/20/87	Letter to Feuer	.25
04/22/87	Review Letter from Bank	.25
04/28/87	Review Letter sent to Defendant from Bank	.25
04/30/87	Review copy of Final Judgment of Foreclosure; Letter to bank	.35
05/04/87	Review Letter from Attorney Feuer	.25
05/05/87	Prepare Letter to Bank; copy of correspondence with Feuer.	.25
05/11/87	Review Notice of Sale Published in Miami Review	.25

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05/18/87	Attendance at foreclosure sale	1.75
05/18/87	Review Letter from Bank	.25
05/26/87	Prepare Agreed Motion Directing Clerk to Issue Certificate of Title in the Name of Otis T. Wallace; Motion to Assign Foreclosure Bid; Prepare Agreed Motion Directing Clerk to Issue Certificate of Title in the Name of Broward Management Company; Forward to Court	2.00
05/28/87	Letter to Bank with Payment from Otis T. Wallace;	.25
06/02/87	Review Letter from Bank and Interoffice Memo from Bank;	.35
06/03/87	Letter to Arthur Calvin, Esquire	.25
06/03/87	Letter to Bank re: copy of correspondence prepared by our office To Arthur Calvin; copy of defendants Objections to the Sale of Property; Copy of Certificate of Title; Copy of Certificate of Disbursements; Copy of Sale;	1.00
06/10/87	Prepare Motion for Deficiency Decree; Affidavit; Letter to Bank;	.75
06/17/87	Review Letter from Bank	.25
06/18/87	Letter to bank in reference to June 15 <sup>th</sup> letter with changes to Motion For Deficiency Decree; Notice of Hearing;	.50
07/27/87	Preparation for and attendance at Motion for Deficiency Decree; Prepare proposed Order; Forward to Court	2.50
08/05/87	Review original loan documents from Bank; Prepare Notice of Filing	.75
08/05/87	Review executed Deficiency Decree	.25
08/07/87	Letter to clerk; Recording and Certification of Deficiency Decree	.25
08/07/87	Prepare Execution; Forward to Sheriff;	.50
08/18/87	Review return of service from Sheriff's office re: docketing of execution	.10
09/14/87	Letter to Bank; copy of certified and recorded Deficiency Decree;	.25
09/15/87	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
10/16/87	Conferences with process server; Review returns of service from process server	.50
10/16/87	Review Letter and Records from Southern Bell Records Custodian	1.00
10/21/87	Conferences with process server; Review returns of service from process server	.50
10/22/87	Preparation for and attendance at deposition of Defendant	2.00
10/22/87	Review Certificate of Non-Appearance	.25

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12/15/87	Prepare Contempt Notice, Motion and Notice of Hearing (Kiambu Chaka)	.75
12/15/87	Prepare Contempt Notice, Motion and Notice of Hearing (Idella Jackson)	.75
12/17/87	Review returns of no service	.20
10/03/90	Review Letter from bank;	.25
10/09/90	Letter to Michael Vander Wyden	.35
01/30/95	Review Letter from Bank	.25
05/12/95	Review Letter from Bank	.25
06/15/95	Prepare Notice of Taking Deposition in Aid of Execution; Prepare Subpoenas Duces Tecum for Deposition in Aid of Execution; Conference with process server; Conference with Court Reporter	1.50
06/20/95	Conferences with process server	.25
06/28/95	Review returns of service	.25
07/11/95	Letter to Kiambu Chaka	.25
07/18/95	Prepare Re-Notice of Taking Deposition	.35
08/09/95	Review Certificate of Non-Appearence	.25
10/27/95	Prepare Re-Notice of Taking Deposition	.35
02/21/97	Review file; Conference with Bank	1.00
02/17/99	Review correspondence from Bank	.25
11/27/00	Prepare Status Report	.50
05/29/01	Letter to Bank	<u>.25</u>

Total Hours 46.15

46.15 @ \$110.00 = \$5,076.50